



Order Filed on August 25, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Inez M. Markovich, Esq. MCCARTER & ENGLISH, LLP 1600 Market Street, Suite 3900 Philadelphia, PA 19103 Telephone (215) 979-3854 Facsimile (215) 988-4319 Email: imarkovich@mccarter.com	
<i>Counsel for National Financial Solutions, LLC</i>	
In re:	
LORI KIM ANDREWS JONES A/K/A LORI-KIM ANDREWS, A/K/A LORI-KIM VICTA,	
Debtor.	


Chapter 13

Case No. 21-16020 (ABA)

**CONSENT ORDER RESOLVING THE LIMITED OBJECTION AND RESERVATION OF
RIGHTS OF NATIONAL FINANCIAL SOLUTIONS, LLC TO
DEBTOR'S MOTION TO SELL PROPERTY**

The relief set forth on the following pages, numbered two (2) through four (4), is hereby
ORDERED.

DATED: August 25, 2022



Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court

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Debtor: Lori Kim Andrews Jones a/k/a Lori-Kim Andrews a/k/a Lori-Kim Victa
Case No.: 21-16020 (ABA)
Title: Consent Order Resolving the Limited Objection and Reservation of Rights of National Financial
Solutions, LLC to Debtor's Motion to Sell Property

THIS MATTER having been brought before the Court by the Debtor's Motion to Sell Property (Dkt. NO. 57) (the "Motion") seeking authorization to sell the real property located at 308 North Clarendon Avenue, Margate, NJ 08402 (the "Real Property"), and the Limited Objection and Reservation of Rights of National Financial Solutions, LLC to Debtor's Motion to Sell Property (the "Limited Objection") (Dkt. No. 62), and counsel for National Financial Solutions, LLC (Inez M. Markovich, Esq.), counsel to Regency Account LLC (Holly Miller Smith, Esq), and counsel for the Debtor (Andrew B. Finberg, Esq.) having reached an amicable resolution of the matter; and the Court having considered the representations made by the parties; and for good cause shown,

IT IS on this ____ day of _____, 2022,

ORDERED as follows:

1. The Debtor is authorized to sell the Real Property on the terms and conditions of the contract of sale pursuant to 11 U.S.C. §§ 363(b) and 1303.
2. The proceeds of sale must be used to satisfy the liens on the real property unless the liens are otherwise avoided by court order. Until such satisfaction the real property is not free and clear of liens.
3. In accordance with D.N.J. LBR 6004-5, the Notice of Proposed Private sale included a request to pay the real estate broker and/or debtor's real estate attorney at closing.

Therefore, the following professional(s) may be paid at closing:

Name of professional: Lydia Lewis

Amount of be paid: 6% of the sales price

Services rendered: Realtor Services

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4. Other closing fees payable by the Debtor may be satisfied from the proceeds of sale and adjustments to the price as provided for in the contract of sale may be made at closing.
5. The amount of \$ 0 claimed as exempt may be paid to the Debtor.
6. The ☐ *balance of proceeds* or the ☐ *balance due on the debtor's Chapter 13 Plan* must be paid to the Chapter 13 Trustee in the Debtor's case, except as stated in Paragraph 9 below.
7. A draft HUD-1 or ALTA settlement statement (the "Settlement Statement") shall be provided to National Financial Solutions, LLC ("NFS") and Regency Account LLC ("Regency") for review and approval at least 3 days prior to closing, and a copy of the executed Settlement Statement must be forwarded to the Chapter 13 Trustee 7 days after closing.
8. ☐ The debtor must file a modified Chapter 13 Plan not later than 21 days after the date of this order.
9. Other provisions:
 - 1) NFS shall receive \$150,000.00 from the sale of the Real Property in satisfaction of its secured claim, provided that the closing of such sale occurs, and NFS receives \$150,000.00, no later than September 16, 2022. Payment of \$150,000.00 to NFS shall be displayed on the Settlement Statement and shall be paid in full at closing via wire transfer directly from the title company to NFS as per the wiring instructions provided to the title company by NFS. In the event sale of the Real Property does not occur on or before September 16, 2022, NFS's agreement to accept \$150,000.00 in satisfaction of its claim secured by the Real Property shall automatically become null and void, and NFS shall be entitled to exercise any and all of its rights and remedies with respect to the Real Property, including,

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but not limited to, (i) seeking relief from the automatic stay to foreclose on the Real Property upon the filing of a certification of NFS's counsel stating that NFS failed to pay \$150,000.00 to NFS in accordance with the provisions of this order, and Debtor agrees not to oppose NFS's efforts to obtain stay relief and/or foreclose on the Real Property, and (ii) collecting the full amount of obligations owed by the Debtor to NFS and secured by the Real Property, including, but not limited to, all late charges, interest rate at the default rate; and legal fees and costs incurred by NFS, as shall be determined in accordance with the applicable loan documents.

- 2) The full balance of \$250,000.00 due to Regency per the Settlement Agreement dated March 23, 2022 (the "Settlement Agreement") shall be paid at closing via wire transfer in accordance with paragraph 2(a)(i) of the Settlement Agreement and shall be displayed on the Settlement Statement.

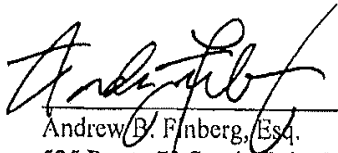
[Consent Signature Page Follows]

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Solutions, LLC to Debtor's Motion to Sell Property

The undersigned consent and agree
to the entry of this Stipulation and Consent Order:

Law Offices of Andrew B. Finberg, LLC

MCCARTER & ENGLISH, LLP



Andrew B. Finberg, Esq.
525 Route 78 South, Suite 200
Marlton, NJ 08053
Telephone (856) 988-9055
Email: andy@sjbankruptcylaw.com

Counsel for Debtor

Dated: August 23, 2022




Inez M. Markovich, Esq.
1600 Market Street, Suite 3900
Philadelphia, PA 19103
Telephone (215) 979-3854
Email: imarkovich@mccarter.com

Counsel for National Financial Solutions, LLC

Dated: August 23, 2022

Gellert Scali Busenkell & Brown, LLC



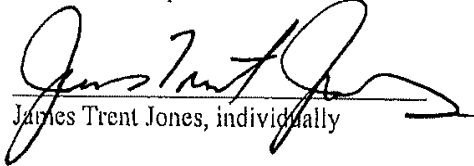
Holly S. Miller, Esq.
8 Penn Center
1628 John F. Kennedy Boulevard, Suite 1901
Philadelphia, PA 19103
Telephone: (215) 238-0012
Email: hsmith@gsbblaw.com

Counsel for Regency Account LLC

Dated: August 23, 2022

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The undersigned acknowledges that he has reviewed the foregoing consent order and, in his capacity as the non-debtor holder of a tenancy-by-the-entirety interest in the Real Property, consents to its provisions.


James Trent Jones, individually

In re:
Lori Kim Andrews Jones
Debtor

Case No. 21-16020-ABA
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0312-1
Date Rcvd: Aug 25, 2022

User: admin
Form ID: pdf903

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 27, 2022:

Recip ID	Recipient Name and Address
db	+ Lori Kim Andrews Jones, 48 Whyte Drive, Voorhees, NJ 08043-4152

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 27, 2022

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 25, 2022 at the address(es) listed below:

Name	Email Address
Andrew B. Finberg	on behalf of Debtor Lori Kim Andrews Jones andy@sjbankruptcylaw.com abfecf@gmail.com;finbergar39848@notify.bestcase.com
Denise E. Carlon	on behalf of Creditor U.S. Bank N.A., successor trustee to LaSalle Bank National Association, on behalf of the holders of Bear Stearns Asset Backed Securities I Trust 2007-HE7, Asset-Backed Certificates Series 2007-HE7 dcarlon@kmlawgroup.com, bkgroup@kmlawgroup.com
Gregory Lomax	on behalf of Creditor Lauletta Birnbaum LLC glomax@lauletta.com, vmarr@lauletta.com
Harold N. Kaplan	on behalf of Creditor JPMORGAN CHASE BANK N.A. hkaplan@rasnj.com, informationathnk@aol.com
Holly Smith Miller	on behalf of Creditor Regency Accounts LLC hsmiller@gsbblaw.com

District/off: 0312-1

User: admin

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Date Rcvd: Aug 25, 2022

Form ID: pdf903

Total Noticed: 1

Holly Smith Miller

on behalf of Plaintiff Regency Accounts LLC hsmiller@gsbblaw.com

Inez M. Markovich

on behalf of Creditor National Financial Solutions LLC imarkovich@mccarter.com, rstratz@andersonkill.com

Isabel C. Balboa

ibalboa@standingtrustee.com

Isabel C. Balboa

on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com

Sindi Mncina

on behalf of Creditor JPMORGAN CHASE BANK N.A. smncina@raslg.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 11